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July 27, 2022

VIA ECF AND EMAIL

Hon. Analisa Torres
U.S. District Court, Southern District of New York
David Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Natural Resources Defense Council, et al. v. DeJoy, et al.*,
No. 22-cv-3442

Dear Judge Torres:

Defendants notify the Court that the U.S. Postal Service requires an additional fourteen days, up to and including August 22, 2022, within which to file the joint motion for a protective order, and an additional fourteen days, up to and including August 29, 2022, within which to file the certified list of the contents of the administrative record.

The parties filed a joint case management plan and proposed scheduling order (ECF No. 36-1) on June 27, 2022, stating that by August 8, 2022 the parties “intend[ed] to file a joint motion for a protective order” regarding confidential portions of the administrative record, and that the Postal Service “anticipate[d] filing a certified list of the contents of the administrative record on August 15, 2022.” *Id.* at 2. The plan further stated that the Postal Service would “promptly notify the Court” if “additional time is required to file the certified list.” *Id.* The court adopted the plan and scheduling order in relevant part. (ECF No. 37)

For the reasons detailed in the declaration attached to this notice, despite several Postal Service cross-functional teams working diligently to complete the administrative record and prepare the certified list, the Postal Service now anticipates that it will be able to file the certified index on August 29, 2022. The Postal Service also anticipates that it will be able to file the joint motion for a protective order by no later than August 22, 2022.

If, based on additional developments, any further time is needed within which to file the certified list or motion for a protective order, Defendants will promptly notify the Court.

Respectfully submitted,

/s/ Timothy S. Bishop
Timothy S. Bishop